

Main Data Protection Policy**wef 1 Nov 2018****Summary**

We will collect, use or disclose personal data for reasonable business purposes only if there is consent or deemed consent from the individual and information on such purposes have been notified. We may also collect, use or disclose personal data if it is required or authorised under applicable laws.

Collection of Personal Data

We collect personal data from clients, customers, business contacts, partners, personnel, contractors and other individuals. Such personal data may be provided to us in forms filled out by individuals, face to face meetings, email messages, telephone conversations, through our websites or provided by third parties. If any individuals contact us, we may keep a record of that contact.

We collect these personal data when it is necessary for business purposes or to meet the purposes for which the individuals have submitted the information.

We will only collect, hold, process, use, communicate and/or disclose such personal data, in accordance with this policy. If any party is acting as an intermediary or otherwise on behalf of a third party individual or supplying us with information regarding a third party individual (such as a friend, a colleague, an employee etc), such intermediary party undertakes that you are an authorised representative or agent of such third party individual and that you have obtained all necessary consents from such third party individual to the collection, processing, use and disclosure by us of their personal data. Because we are collecting the third party individual's data from you, you undertake to make the third party individual aware of all matters listed in this policy preferably by distributing a copy of this policy to them or by referring them to our website.

Use of Personal Data

We use personal data for the following purposes:

- to provide our services
- to respond to the individual's request or for the purposes for which it was provided to us as stated at the time of the collection (or as is obvious from the context of collection)
- to maintain contact with clients and other contacts
- to keep clients and other contacts informed of the services we offer, industry developments, service offerings, seminars and other events we are holding, that may be of interest to them
- for general management and reporting purposes, such as invoicing and account management
- for recruitment purposes
- for purposes related to the employment of our personnel and providing internal services to our personnel
- all other purposes related to our business.

Any individual may choose to unsubscribe from mailing lists, registrations, or elect not to receive further marketing information from us by contacting our [Data Protection Officer](#), or if we have contacted such individual by email, such individual may use the unsubscribe function in that email to notify us. Such requests will be processed within 28 days.

Disclosure of Personal Data to Third Parties

We do not disclose personal data to third parties except when required by law, when we have the individual's consent or deemed consent or in cases where we have engaged third parties such as data intermediaries or subcontractors specifically to assist with our firm's activities. Any such third parties whom we engage will be bound contractually to keep all information confidential.

We may disclose personal data to other member firms in our network of firms, where it is necessary (i) to meet the purpose for which such individual has submitted the information; or (ii) to enable such individual to be provided with information at a later date which may be of relevance and interest to such individual based on the nature and purpose of such individual's voluntary requests. We may also transfer all data in our possession to a successor-in-interest to our business or assets.

Access to and Correction of Personal Data

Upon request, we will provide the individual with access to their personal data or other appropriate information on their personal data in accordance with the requirements of the PDPA.

Upon request, we will correct an error or omission in the individual's personal data that is in our possession or control in accordance with the requirements of the PDPA.

We may charge for a request for access in accordance with the requirements of the PDPA.

Withdrawal of Consent

Upon reasonable notice being given by an individual of his withdrawal of any consent given or deemed to have been given in respect of our collection, use or disclosure of his personal data, we will inform the individual of the likely consequences of withdrawing his consent. We will cease (and cause any of our data intermediaries and agents to cease) collecting, using or disclosing the personal data unless it is required or authorised under applicable laws.

Accuracy of Personal Data

We will make a reasonable effort to ensure that personal data collected by us or on our behalf is accurate and complete.

Security and Protection of Personal Data

We have implemented generally accepted standards of technology and operational security to protect the personal data in our possession or under our control and to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. All our personnel follow a network-wide security policy. Only authorised personnel are provided access to personally identifiable information and these personnel have agreed to ensure confidentiality of this information.

Retention of Personal Data

We will cease to retain personal data, as soon as it is reasonable to assume that the purpose for collection of such personal data is no longer being served by such retention, and such retention is no longer necessary for legal or business purposes.

Transfer of Personal Data outside of Singapore

We will ensure that any transfers of personal data to a territory outside of Singapore will be in accordance with the PDPA so as to ensure a standard of protection to personal data so transferred that is comparable to the protection under the PDPA.

Privacy on Our Websites

This Policy also applies to any personal data we collect via our websites. Cookies may be used on some pages of our websites. "Cookies" are small text files placed on your hard drive that assist us in providing a more customised website experience. Cookies are now used as a standard by many websites to improve users' navigational experience. If individuals are concerned about cookies, most browsers permit individuals to decline cookies. In most cases, a visitor may refuse a cookie and still fully navigate our websites, however other functionality in the site may be impaired. After termination of the visit to our site, a visitor can always delete the cookie from his system if he wishes.

Because we want visitors' website experience to be as informative and resourceful as possible, we may provide a number of links to third party websites. We assume no responsibility for the information practices of these third party websites that visitors are able to access through ours. When a visitor to our website links to these third party websites, our privacy practices no longer apply. We encourage visitors to review each website's privacy policy before disclosing any data.

Data Protection Officer

If an individual believes that information we hold about him is incorrect or out of date, or if an individual has concerns or further queries about how we are handling his personal data, or any problem or complaint about such matters, please contact our Data Protection Officer Ariel Chin at ariel@sgcarmartfs.com

Modifications

We reserve the right to modify or amend this Policy at any time. The effective date will be displayed at the beginning of this Policy.